## REMARKS

Claims 1-6 are presently pending in this application. Apparatus claims 4-6 are withdrawn from consideration.

The rejection of claim 1 over Vinson, *et al.* (U.S. Patent No. 5,374,324) ("Vinson") in view of Bourgois (U.S. Patent No. 4,840,214) under 35 U.S.C. §103(a) is respectfully traversed based on the foregoing amendments and the following remarks.

In the present invention, the plural cord units, each formed by aligning plural belt cords so as to contact with each other, are passed through the plural oval-shaped holes formed in the inserter, wherein each of the cord units passes through the respective oval-shaped holes as shown in Figs. 1-3.

In sharp contrast, Vinson discloses that each of the cords passes through the respective circle-shaped holes formed in the extruder head. That is, the single cord passes through each of the circle-shaped holes as seen from Fig. X provided by the Examiner. Therefore, Vinson is entirely different from the present invention both as to the form of the cords (i.e., single cords v. plural cord units) and the shape of the holes through which the cord units are passed.

Bourgois is relied on merely as showing a reinforcement strip or belt cord made of steel filaments "arranged in parallel to each other." See page 3 of the Office Action dated May 18, 2005. However, Applicant respectfully submits that Bourgois clearly fails to supply the deficiencies of Vinson, as pointed out above. For example, the Examiner does not explain why a person of ordinary skill would not have simply taken all of Vinson's cords and contacted them

ART UNIT 1732 Q65006

AMENDMENT UNDER 37 C.F.R. §1.111 U.S. SERIAL NO. 09/972,942

together (i.e., as one large group of cords) as shown in Bourgois. In contrast, claim 1 of the

present invention clearly recites plural (separate) cord units, each being made up of plural belt

cords and passing through oval-shaped holes. Claim 1 is, therefore, believed to be allowable,

and claims 2 and 3 are believed to be allowable at least by virtue of their dependency.

In view of the preceding amendments and remarks, reconsideration and allowance of this

application are now believed to be in order, and such actions are hereby solicited. If any points

remain in issue that the Examiner feels may be best resolved through a personal or telephone

interview, he is kindly requested to contact the undersigned attorney at the local telephone

number listed below.

The USPTO is directed and authorized to charge all required fees (except the

Issue/Publication Fees) to our Deposit Account No. 19-4880. Please also credit any over-

payments to said Deposit Account.

Respectfully submitted,

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Date: August 9, 2005